

# Welcome to Curve's Privacy Policy

Version: February 2019

## Introduction

1. We at Curve respect your privacy and are committed to protecting your personal data.

The purpose of this privacy policy is to give you a better understanding of:

- what information we collect from you and why;

- how we use your information;

- how your information is stored and shared;

- your rights; and

- other useful privacy and security related matters.

2. We recommend you take the time to read this policy. You can download a PDF version [here](#).

## Data Controller and Data Protection Officer

3. Curve 1 Limited is the data controller responsible for your personal data (collectively "Curve", "we", "us" or "our" in this privacy policy). We are a UK registered company (number 09523903) and located at 15-19 Bloomsbury Way, London WC1A 2TH We are registered with the UK's Information Commissioner's Office ("ICO") with reference ZA135276.

4. We have appointed a Data Protection Officer ("DPO") at Aphaia Limited, located at Studio 5, 155 Commercial Street, London, E1 6BJ and contact telephone: (+44) (0)20 3917 4158). You can contact our DPO if you have any questions about this privacy policy, including any requests to exercise your legal rights, by email at [dpo@aphaia.co.uk](mailto:dpo@aphaia.co.uk). However, our customer support team may be able to resolve your questions and requests more quickly.

Our customer support team can be contacted at [support@curve.app](mailto:support@curve.app) or via the Curve mobile application.

## Personal data we collect about you

5. Personal data means any information that can be used to identify you (either on its own, or when aggregated with other data). It does not include data where your identity has been removed completely or anonymised.

6. We also sometimes refer to “processing”. This means any operation we perform on your personal data, such as collection, organising, storing, updating, using, disclosing and deleting. When you become a Curve customer, we may process different kinds of personal data, which we have grouped together as follows:

Identity data	First name, last name, date of birth, a picture and number of your passport, driving licence or other ID, your selfie photograph, your employment status and industry.
Contact data	Home address and shipping address (if different), email address and mobile telephone number.

Financial  
data

Details of the funding card(s) added to your Curve account, including:

- 16-digit card number;
  
- card's expiry date;
  
- card's CVV number;
  
- cardholder's name;
  
- card's billing address.

Details of your Curve card, including:

- 16-digit card number;
  
- card's expiry date;

	<ul style="list-style-type: none"><li>- card's CVV number</li></ul>
Transaction data	<p>Information about transactions and purchases you make using your Curve card, including the:</p> <ul style="list-style-type: none"><li>- amount &amp; currency;</li><li>- merchant's name &amp; category;</li><li>- merchant's location;</li><li>- image of your uploaded receipt and associated note.</li></ul>
Technical data	<p>Internet Protocol (IP) address used to connect your computer/ mobile device to the internet, geo-location, model of mobile phone.</p>
Profile data	<p>Your preferences, feedback, survey and questionnaire responses.</p>

Marketing and communications data	Additional personal data you provide when you contact us, such as your social media handle, details of messages/ emails you send to Curve, your preferences in receiving marketing from us and communication preferences.
Third-party service data	When you connect your Curve account with a third-party service, your account username held at the third-party service.

7. We also collect aggregated data such as statistical or demographic data. This may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

## How is your personal data collected

8. We use different methods to collect personal data from and about you via:

**Direct interactions.** You may give us your identity data, contact data, financial data, profile data, marketing and communications data and third-party service data by filling in forms on

our Curve mobile application or website, corresponding with us by post, phone, email, in-app support or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our mobile application;
- use certain features or services made available through the mobile application;
- request marketing to be sent to you;
- respond to a questionnaire or survey; or
- give us some feedback or contact us to request support.

**Automated technologies or interactions.** As you interact with our mobile application or website, we may automatically collect technical data about your electronic devices, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties:

- Technical Data from analytics providers;
- Contact, financial and transaction data from providers of payment services;
- Identity and contact data from credit reference and fraud prevention agencies and other publicly available sources such as the electoral register.

## How and why we use your personal data

9. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we have entered into with you;
- where we need to comply with a legal or regulatory obligation; or
- where it is necessary for our legitimate interests and only if your interests and rights do not override those legitimate interests.

## Purposes and legal bases for which we will process your personal data

10. We have set out below, in a table format, a description of the purposes of our processing of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data on more than one legal basis depending on the specific purpose for which we are processing your data.

Purpose/ activity	Type of personal data	Lawful basis for processing, including basis of legitimate interest
Register you as a Curve customer, so that we can:  - Create and host your Curve account;	Identity data;  Contact data.	- Performance of contract with you or taking steps to enter into such contract (it is part of the contract between you and us to create for you a secure Curve account, so you can use our products and services).

<ul style="list-style-type: none"> <li>- Inform you that your account has been created;</li>   <li>- Create your Curve card;</li>   <li>- Dispatch and deliver your Curve card safely and securely.</li> </ul>	<p>Financial data.</p>	<ul style="list-style-type: none"> <li>- Necessary for our legitimate interests (to prevent Curve products being used for fraud or other financial crime).</li> </ul>
<p>Confirm your identity, so that we can:</p> <ul style="list-style-type: none"> <li>- Detect and prevent identity and other financial fraud and crime;</li>   <li>- Verify your age and the accuracy of the personal data you provide.</li> </ul>	<p>Identity data;</p> <p>Contact data;</p> <p>Financial data;</p>	<ul style="list-style-type: none"> <li>- Necessary to comply with a legal obligation (we have a legal obligation to perform know-your-customer checks and other due diligence on all our customers).</li>   <li>- Necessary for our legitimate interests (to prevent Curve products being used for fraud or other financial crime).</li> </ul>

<p>Provide you with the products and services that you request from, or via us, so that we can:</p>	<p>Identity data;</p>	<p>- Performance of a contract with you (it is part of our contract to create a Curve account for you and to issue you with a Curve card as well as other services).</p>
<p>- Provide you with a Curve account and a Curve card;</p>	<p>Contact data;</p>	<p>- Necessary for our legitimate interests (to recover fees/ debts due to us).</p>
<p>- Manage the operation of your Curve account;</p>	<p>Financial data;</p>	
<p>- Add funding cards to your Curve account;</p>	<p>Transaction data;</p>	
<p>- Manage and process fees and charges;</p>	<p>Third-party service data;</p>	
<p>- Collect and recover money owed to us.</p>		

<p>Process your payment transactions, so that we can:</p> <p>- Process your payment request and authorise or decline your transaction.</p> <p>- Detect and prevent fraud, money laundering or other financial crime.</p>	<p>Identity data;</p> <p>Contact data;</p> <p>Financial data;</p> <p>Transaction data;</p> <p>Technical data;</p>	<p>- Performance of contract with you (it is part of the contract between you and us to process your payment transactions).</p> <p>- Necessary to comply with a legal obligation (we have a legal obligation to detect and prevent fraud, other financial crimes and any misuse of the Curve product).</p> <p>- Necessary for our legitimate interests (to avoid losses arising from financial crime and to ensure that you and every customer can safely use Curve).</p>
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<p>To manage our relationship with you, so that we can:</p> <ul style="list-style-type: none"> <li>- Notify you about changes to our terms or privacy policy</li> <li>- Contact you if there is any action you need to take to be able to continue using our products and services;</li> <li>- Provide excellent customer support to you and answer all your queries and requests;</li> <li>- Ask you to leave a review or take a survey.</li> </ul>	<p>Identity data;</p> <p>Contact data;</p> <p>Transaction data;</p> <p>Profile data;</p>	<ul style="list-style-type: none"> <li>- Performance of a contract with you (it is part of our contract with you to notify you of certain changes and events);</li> <li>- Necessary to comply with a legal obligation (we are required by law to inform you of certain changes and to provide certain information to you);</li> <li>- Necessary for our legitimate interests (to keep our records updated, to keep our customers happy with our service and to study how our customers use our products/ services);</li> </ul>
<p>Manage and improve our day-to-day operations, so that we can:</p>	<p>Identity data;</p>	<ul style="list-style-type: none"> <li>- Necessary for our legitimate interests (to improve the product and the experience for all Curve customers, to run our business, provide administration and IT services, network security, and in the context of a</li> </ul>

<p>- Maintain and improve the Curve mobile application or website;</p> <p>- Troubleshoot, analyse data, carry out system maintenance, support, reporting and hosting of data</p>	<p>Contact data;</p> <p>Technical data;</p>	<p>business reorganisation or group restructuring exercise)</p>
<p>To make suggestions and recommendations to you about goods or services that may interest you, so that we can email you about new Curve products that we may introduce from time-to-time.</p>	<p>Identity data;</p> <p>Contact data;</p> <p>Technical data;</p>	<p>- Necessary for our legitimate interests (to develop our product and grow our business).</p>

	<p>Profile data;</p>	
<p>Provide you with marketing emails relating to the Curve product.</p>	<p>Identity data;</p> <p>Contact data;</p> <p>Marketing and communications data.</p>	<p>- With your consent, we can provide you with marketing communications. However, you can change your choice and withdraw your consent at any time.</p>

Insurance	Identi ty data  Cont act data	<ul style="list-style-type: none"> <li>- To enable the insurance provider to identify you and process both the insurance policy and any claims that may be made by you for the insurance.</li> <li>- Performance of contract (it is part of the contract between Curve and you to provide you with certain insurance services as agreed)</li> </ul>
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## If you fail to provide personal data

11. Where we need you to provide personal data by law, or under the terms of any contract we may have with you, or in order to enter into a contract, we will inform you. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a Curve account). In this case, we may have to cancel a product or service you have with us or provided by other third parties through us, but we will notify you if this is the case at the time.

## Curve communication and opting out

12. You can ask us to stop sending you marketing emails at any time by following the unsubscribe links at the bottom of any Curve marketing message. Where you opt out of receiving these marketing messages, this will not apply to operational emails that may be required to provide you with relevant information about your Curve account from time to time.

13. If you would like to stop receiving Curve receipt emails (for each of your payments), please change your preference for each of your funding cards on the Curve mobile application.

14. If you need help with managing the communications you receive from Curve (including marketing emails and mobile push notifications), please contact us at [support@curve.app](mailto:support@curve.app) or via the Curve mobile application.

## Cookies

15. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

16. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile phone if you agree. Cookies contain information that is transferred to your computer's hard drive. We use session cookies which are cookies which expire once you close your web browser.

17. We use three types of cookies: strictly necessary, analytical/ performance and targeting cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including necessary cookies) you may not be able to access all or parts of our website.

## Change of purpose

18. We will only use your personal data for the purposes and reason for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required by law.

## Sharing your personal data with third-party recipients

19. In order to fulfil the purposes for processing your personal data, as set out above, we need to share your personal data with a limited number of carefully selected third-parties.

20. We necessitate all third-party recipients to respect the security of your personal data and treat it in accordance with the law. We do not allow our third-parties to use your personal data for their own purposes (such as marketing or reselling) and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

21. We may disclose your personal data to the following categories of third-party recipients:

Recipient category	Explanation
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Hosti ng	We share your personal data with cloud storage providers to safely and securely store your personal data.
Regi strati on	We share your personal data with identity checking and fraud prevention agencies. Note: if fraud is identified or suspected, law enforcement agencies may be given access to your personal data.
Curv e card fulfil ment	We share your personal data with card manufacturing, personalisation and delivery companies.
Pay ment proc essin g	We share your personal data with financial services providers, including card issuers, banking partners and banking intermediaries as well as technical transaction processing service providers.

Anal ytic tools	We share your personal data with analytics and search engine service providers that assist us in the improvement and optimisation of the Curve product.
Admi nistr ation and supp ort tools	We share your personal data with customer support software providers.
Emai ling	We share your personal data with emailing service providers.
Integ ratio ns	We may provide you integrations with third-party providers and we may share your personal data with them to provide you these services.
Busi ness reorg anis	We may share your personal data with third-parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to

<p>ation / sale</p>	<p>our business, then the new owners may use your personal data in the same way as set out in this privacy policy.</p>
<p>Insu ranc e servi ce provi der</p>	<p>We may share your personal data with third-party providers so we can provide these insurance services to you.</p>

## 22. Insurance

Curve may share your personal information with Inter Partner Assistance SA, member of the AXA Assistance group, Avenue Louise 166, 1050, Brussels, Belgium, insurance company regulated by the National Bank of Belgium under the number 0487, Company number: 0415.591.055 (“AXA”) in order to provide you with insurance services linked to the Curve Black and Curve Metal tier. If you have not subscribed to either of these tiers, your personal information will not be shared. Curve needs to share this data in order to be able to provide insurance services, as this enables AXA to create the your insurance policy and provide you with the necessary associated services. In this instance, AXA will be a data controller and Curve and AXA will not be joint controllers of your data. Please, find further information included in your insurance terms and conditions as were issued to you and at [www.axa-assistance.com/en.privacypolicy](http://www.axa-assistance.com/en.privacypolicy)

## International transfers

23. The majority of our third-party processors are based in the European Economic Area (EEA) however, when your personal data is transferred outside the EEA for further processing by the recipients described above, we ensure at least one of the following safeguards is implemented:

- we will only transfer the personal data to a country which is deemed by the European Commission to provide an adequate level of protection for personal data;
- where we transfer the data to third parties, we will use specific contracts between us and the recipient in a form approved by the European Commission to protect it;
- where the transfer is to the USA, the recipient is within the EU-US Privacy Shield.

## Data security

24. We have put in place appropriate and industry standard security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way,

altered or disclosed. In addition, we limit access to your personal data to only those employees who have a legitimate reason to view and process it.

25. All parties with access to your personal data are all subject to a strict duty of confidentiality.

26. We have put in place procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so.

## How long will you keep my personal data for?

27. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

28. Curve is obligated under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 to retain your personal data for a period of five years. This applies even if you do not complete your registration as a Curve customer.

29. We will not hold any of your personal data for more than five years after the termination of our relationship.

## Your rights

30. Under the General Data Protection Regulation (GDPR), you, as a data subject have a number of rights which are detailed below:

31. **Request access** to your personal data that we hold about you (commonly known as a “data subject access request” or DSAR). This enables you to receive a copy of the personal data we hold about you or are otherwise processing.

32. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. We will need to verify the accuracy of the new data you provide to us.

33. **Request erasure** of your personal data that we hold about you. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to

comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**34. Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**35. Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**36. Request the transfer** of your personal data to you or to a third-party. We will provide to you, or a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**37. Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to

provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## No fee usually required

37. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## Your right to complain

39. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO can be reached [here](#). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Contact

40. If you have any further questions or would like to exercise any of the rights set out above, please contact us at [support@curve.app](mailto:support@curve.app) or via the Curve mobile application. We always welcome your comments or suggestions, including thoughts on how we can improve or clarify this privacy policy.

41. It is important that the personal data we hold about you is accurate and up-to-date. Please keep us informed if your personal data changes during your relationship with us.

42. Our Data Protection Officer (DPO) at [Aphaia Limited](#) can be reached directly at [dpo@aphaia.co.uk](mailto:dpo@aphaia.co.uk)